

E X H I B I T F

AFFIDAVIT BY MICHAEL WILLIAMSON

STATE OF OHIO)
) SS.
COUNTY OF RICHLAND)

Exhibit F

AFFIDAVIT OF MICHAEL WILLIAMSON

I, Michael Williamson, inmate number A423451, am a prisoner of the State of Ohio, confined at the Richland Correctional Institution, hereby swears and state that the following statements of facts are true under the penalty of perjury.

1. On February 29, 2012 I was residing at the Lorain Correctional Institution as a Cadre. I fell off a cabinet in my cell landing on the sink breaking both bones in my left leg causing me to have a metal plate and 12 screws and rods installed.
2. I was later given a special security review and my security level was lowered from a level 3 inmate to a level 2 inmate. I was then transferred to a prison that could house disabled inmates. I was sent to Marion Correctional Institution around the end of 2012 the beginning of 2013.
3. While at Marion I was issued a wheelchair that I was in for almost 2 years. I was later seen by a doctor, Dr. Granson, who prescribed a rollator for me. I was told verbally by doctor Granson that I would have problems with my leg for the rest of my life, that I would be dependent on the use of a rollator always.
4. In 2015 I was transferred to Richland Correctional Institution where I reside at now. I have been here since 2015. I never had any problems with medical concerning my mobility device until February of 2019 when I first encountered Ms. Wheeler. During that visit back in February of 2019 I was there because I couldn't breath. Ms. Wheeler "examined" my lungs and said to me that "theres nothing wrong with you". When I asked why then am I coughing everytime I take a breath, she didn't answer, she simply gave me a bottle of cough syrup and a hand full of Ibuproffen and asked me why did I have the rollator, and I explained to her the reason and showed her my leg. She then told me that I didn't need the rollator and that she was going to take it from me but didn't. (I took that as a threat). She then told me to leave.
5. Because of the wear and tear of the constant use of my rollator I go

through a lot of them. While I was at Marion, when my rollator broke down, they were simply sent to maintenance where an inmate was trained in the fixing of them and then returned it to me the same day. Here at Richland when my rollator would break down a new one was ordered by medical each time. Since I've been here at Richland I have went through a lot of them and medical has to order me a new one everytime.

6. On 5/12/2022 I was issued a pass for my Chronic Care visit due to my High Blood Pressure. The pass was for Ms. Wheeler. After that visit she asked me again why did I have the rollator. I explained to her once again why and showed her my leg. She took one look at my leg and looked at me and said "YOU ARE HEALED, YOU DON'T NEED IT", and took it away from me.
7. I returned to my dorm on 5/12/2022 and sent a kite to medical asking for the exact reason why my rollator was taken from me. Before the kite was answered I received another pass on 5/13/2022 for the following Monday, 5/16/2022 for an x-ray of my lower back and hip. Then the kite I sent to medical was answered on 5/16/2022 saying, "You were seen on 5/12 by Ms. Wheeler education provided regarding rollator is worse for back stability of hips. If you are unhappy with her decision I can refer you to our other nurse practitioner for a second opinion. I placed you on the list to see another practitioner". (copy of kite attached hereto) On or about May 18, 2022 I was seen by Ms. O, another nurse practitioner who did a proper examination of my leg and decided then that I did need the use of the rollator and she issued it back to me saying that she will reevaluate me in thirty (30) days and that I should try to loose some weight. (Ms. O now no longer works here at Richland according to the Health Care Administrator, Mr. Shelton). I wonder why!
8. On 6/16/2022 I received another pass to be seen by Wheeler. The pass says Mandatory/Ms. Wheeler/DSC. DSC stands for Doctor Sick Call. Copy of pass is attached. Ms. Wheeler is a nurse Practitioner and not a doctor. I went in and saw her for the evaluation, that was supposed to be performed by Ms. O. Ms. Wheeler said to me that Ms. O should never have given the rollator back to you and that i am taking it from you again "because" your bone is healed the equipment in your leg is stable, hip and back is oksy". I refer you back to ¶ 7 lines 4, 5, 6.
9. Ms. Wheeler did not do, nor has she ever done, an examination of my leg. She made no inquiry upon how long I can stand or how long I can walk. She did not touch my leg to apply pressure to see if I had a response to pain. And, in fact, the reason she initially took my rollator, according to her,

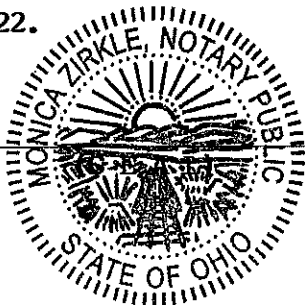
was due to "concern" of the effects it may have on my back and hips. But my back and hips are just fine, according to the X-Rays, and Ms. Wheeler.

10. In short, I was denied my "second opinion" and was met with Ms. Wheeler's retaliatory override of Ms. O's decision as well as the original prescribing doctor.
11. I tried explaining to Ms. Wheeler again that I can't walk for long periods of time and that I can't stand for long periods of time because of the constant pain that I am in. She simply looked at me and said again "I'm taking the rollator, do you want a cane?" I tried asking her another question and she said she wasn't answering any of my question. I was told to leave.
12. I have never had any problems with any other providers in the 8 years I have been dependent on my mobility device until Ms. Wheeler.
13. I am in pain all the time. When I walk, when I stand, when it get's cold outside, or when it rains. I have lots of problems with stability in the early morning hours, when I first wake up, trying to go to the bathroom. Virtually every task I do is now more painful and complicated. Also, because of my high-blood presure, I get head aches and dizzy spells and weak in the knees, and my rollator is the only thing that keeps me from collapsing.
14. I have told Ms. Wheeler of my problems and she is deliberately indifferent to my medical needs, my physical pain, and my physical well being.
15. Since the wrongful taking of my rollator, I've had no choice but to buy and take multiple pain relievers from Commissary, like Ibuprofen, Napeoxen Sodium, and Acetaminophen, which now causes me serious pain in my stomach. The fact that the pins, plate, and screws are properly in place does not negate the daily aches, pain, swelling, and just constant pain that I am always in.

Your affiant further sayeth naught.


Affiant

Sworn to and subscribed before me, a Notary Public, on this 19th day of July, 2022.




NOTARY PUBLIC

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